

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY CONSTRUCTION PERMIT

Permit No.: 231CP02

Issuance Date – December 9, 2003

Application Number: X188

Revision 1: Date – May 11, 2004

The Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Construction Permit No. 231CP02 to the Permittee, **Trident Seafoods Corporation**, to install a new Caterpillar D3516B diesel electric-generator at the **Akutan Seafood Processing Facility**.

This permit satisfies the obligation of the owner and operator to obtain a construction permit as set out in AS 46.14.130(a).

As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this construction permit.

[18 AAC 50.320(b), 1/18/97]

John F. Kuterbach, Manager
Air Permits Program

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List of Abbreviations Used in this Permit

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AS	Alaska Statutes
ASTM	American Society of Testing and Materials
bhp	brake horsepower or boiler horsepower ¹
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
dscf	Dry standard cubic feet
EPA	US Environmental Protection Agency
gr/dscf	grain per dry standard cubic feet (1 pound = 7000 grains)
GPH	gallons per hour
HHV	Higher heating value
ID	Source Identification Number
kW	kilowatts
MACT	Maximum Achievable Control Technology
Mlb	thousand pounds
MMBtu	Million British Thermal Units
NAICS	North American Industry Classification System
NESHAPs	Federal National Emission Standards for Hazardous Air Pollutants [as defined in 40 CFR 61]
NSPS	Federal New Source Performance Standards [as defined in 40 CFR 60]
ppm	Parts per million
ppmv	Parts per million volume
PS	Performance specification
PSD	Prevention of Significant Deterioration
RM	Reference Method
SIC	Standard Industrial Classification
TPH	Tons per hour
TPY	Tons per year
Wt%	weight percent

Pollutants

CO	Carbon Monoxide
HAPS	Hazardous Air Pollutants [as defined in AS 46.14.990(14)]
H ₂ S	Hydrogen Sulfide
NO _x	Oxides of Nitrogen
PM ₁₀	Particulate Matter [as defined in 18 AAC 50.990(70)]
SO ₂	Sulfur dioxide
VOC	volatile organic compound [as defined in 18 AAC 50.990(103)]

¹ 1 boiler horsepower = 33,472 Btu-fuel per hp-hr divided by the boiler's efficiency. 1 brake hp = 7000 Btu-fuel per hp-hr on average for diesel IC engines.

Section 1 - Identification

Names and Addresses

Permittee:	Trident Seafoods Corporation 5303 Shilshole Avenue NW Seattle, WA 98107-4021
Facility:	Akutan Seafood Processing Facility
Location:	54° 08' North; 165° 47' West
Physical Address:	Akutan Harbor, Akutan Island, Alaska
Owner/Operator:	Trident Seafoods Corporation 5303 Shilshole Avenue NW Seattle, WA 98107-4021
Permittee's Responsible Official:	Mr. Earl R. Hubbard Vice President of Regulatory Affairs Trident Seafoods Corporation 5303 Shilshole Avenue NW Seattle, WA 98107-4021 (206) 783-3818
Designated Agent:	Mr. Earl R. Hubbard Vice President of Regulatory Affairs Trident Seafoods Corporation
Facility and Building Contact:	Mr. Stephan M. Francis Akutan Environmental, Health and Safety Manager P.O. Box 9 Akutan, AK 99553 (907) 698-2211
Fee Contact:	Mr. Earl R. Hubbard Vice President of Regulatory Affairs Trident Seafoods Corporation 5303 Shilshole Avenue NW Seattle, WA 98107-4021 (206) 783-3818
SIC Code of the Facility:	2091, 2092 – Prepared Fresh or Frozen Fish and Seafood

[18 AAC 50.350(b), 1/18/97]

Section 2 - General Emission Information

Emissions of Regulated Air Contaminants, as provided in the Permittee's application:

NO_x, CO, PM₁₀, VOCs, and SO₂

Construction Permit Classifications:

Note: Facility Classifications are described under 18 AAC 50.300(b) through (g), modification classifications are described under 18 AAC 50.300(h), and owner requested limits are described under 18 AAC 50.305(a)(1) through (4).

This construction permit is an owner requested revision as described under 18 AAC 50.305(a)(4) to avoid project classification as PSD major and as having actual emission increases.

[18 AAC 50.350(b), 1/18/97]

Section 3 - Permit Continuity and Expiration

1. If permit terms and conditions listed in this permit conflict with those of Permit No. 231TVP01 or Consent Decree No. 01-470-86-2623, the Permittee shall comply with terms and conditions listed herein.
2. DELETED

Section 4 - Source Inventory and Description

3. **Authorization and Notification Requirements.** The Permittee is authorized install Source ID 4b. The source descriptions and ratings are given for identification purposes only. The facility equipment inventory prior to this project is listed in Permit No. 231TVP01, as modified by Consent Decree No. 01-470-86-2623.

Table 1: Construction Permit Source Inventory

ID	Source Name	Source Description	Rating/ Size	Install Date
4b	Pollock Generator #1	Caterpillar Model D3516B Quad Turbo Low NO _x Diesel Electric Generator, Serial # 7RN01420	1,770 kW	12/2003

Section 5 - Operational Restrictions, Limits, and Emissions Standards

4. **Operational Limits.** The Permittee may operate the backup engine-generator, Source ID 4b, only when another permitted engine-generator (Sources IDs 1-7 and 27) has broke down and is not operating. During operations of the backup engine-generator, comply with the following:
 - 4.1 Prior to operation, de-rate Source ID 4b to no greater than the maximum rated permitted electrical output of the engine-generator it is replacing as listed in Permit No. 231TVP01. Submit a copy of the de-rated flash files in the Facility Operating Report as set out by Condition 49 of Permit No. 231TVP01.
 - 4.2 For each incident that Source ID 4b operates, record the date, time of startup, hour-meter reading before startup, total operating hours, total fuel consumption, total kilowatt hours, and reason for replaced unit breakdown. Submit records in the Facility Operating Report as set out by Condition 49 of Permit No. 231TVP01.
5. **Sulfur Compound Emissions.** Source ID 4b shall comply with the sulfur compound emission standard as set out by Condition 6 of Permit No. 231TVP01. In addition, all industrial and fuel burning sources shall use fuel with a sulfur content of no more than 0.35 percent by weight. Monitor, record, and report for all sources as set out by Conditions 6.2, 6.3, 6.4, and 6.5 of Permit No. 231TVP01.
6. **Stack Changes.** Prior to startup of Source ID 4b, stack heights and diameters shall be changed in accordance with the Trident Akutan construction permit application submitted in July 2003 and as follows:
 - 6.1 No stack shall be equipped with a raincap or other device restricting vertical flow of exhaust gases.
 - 6.2 Provide each stack with:
 - a. sampling ports that comport with 40 C.F.R. 60, Appendix A, Method 1, Section 2.1, and a stack or duct free of cyclonic flow at the port location during applicable test methods and procedures;
 - b. safe sampling platforms;
 - c. safe access to sampling platforms; and
 - d. utilities for emission sampling and testing equipment;
 - 6.3 By February 1, 2004, submit to ADEC the as-built engineering drawings and photographs of stack parameters on each source to ensure compliance with Condition 6.

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7. **Opacity and Particulate Matter.** Source ID 4b shall comply with the opacity and particulate matter limits as set out by Conditions 4 and 5 of Permit No. 231TVP01. Monitor, record, and report for Source ID 4b in accordance with Section 13 of Permit No. 231TVP01.
8. **Fuel and NO_x Limits.** Fuel consumption and NO_x emissions from Source ID 4b shall be accounted for in the limits as set out by Condition 15 of Permit No. 231TVP01, as modified by paragraphs 23.a, 23.d through 23.f, and 24 of Consent Decree No. 01-470-86-2623. Monitor, record, and report for Source ID 4b in accordance with Conditions 15 and 19 of Permit No. 231TVP01 and paragraphs 23.a, 23.d through 23.f, and 24 of Consent Decree No. 01-470-86-2623. Use site specific Caterpillar D3516B NO_x emission factors as approved by the Department to determine NO_x emissions.